

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION

UNITED STATES OF AMERICA	)	DOCKET NO. 5:15CR15-RLV
	)	
v.	)	
	)	
(1) STEVEN W. CHASE	)	
_____	)	

**GOVERNMENT’S REQUEST FOR RECIPROCAL DISCOVERY**

NOW COMES the United States of America, by and through Jill Westmoreland Rose, United States Attorney for the Western District of North Carolina, and requests reciprocal discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure. Counsel for the defendant has requested discovery materials in this matter, and the Government has complied with and will continue to comply with the provisions of Rule 16.

Therefore, the undersigned Assistant United States Attorney and Trial Attorney request from defense counsel all discovery which is required to be provided pursuant to Rule 16. Specifically, the undersigned is requesting permission to inspect and copy or photograph books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody, or control of the defendant in this case and which the defendant intends to introduce as evidence-in-chief at trial.

The government also requests permission to inspect and copy or photograph any results or reports of physical or mental examination and of scientific tests or experiments made in connection with this case, or copies thereof, within the possession or control of the defendant which the defendant intends to introduce as evidence-in-chief at his trial or which were prepared by a witness whom the defendant intends to call at this trial where such results relate to that witness' testimony,

and of scientific tests or experiments made in connection with this case, within the possession or control of the defendant, which the defendant intends to introduce as evidence at trial. In addition, the government requests that defendant, through counsel, provide a written summary of an expert witnesses' opinions, the bases and reasons for those opinions, and the witnesses' qualifications.

**RESPECTFULLY SUBMITTED**, this the 6<sup>th</sup> day of September, 2016.

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UNITED STATES ATTORNEY

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, September 6, 2016, the foregoing was duly served upon counsel for the defendant by electronic means via the Court's ECF system to:

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